



WI revised draft permit language on bypass /overflow to discuss at 1:00 today

Patrick Kuefler to: Tom.Mugan, Michael.Lemcke

10/11/2012 10:51 AM

Cc: Gary Prichard, Stephen Jann, Janet Pellegrini, John Wiemhoff,
George Azevedo

History: This message has been forwarded.

**EPA comments for Bypass provisions of Oshkosh, Superior, and Fon du Lac Permits
10/11/12**

1. The assumption underlying WDNR's latest language is that there will already have been an adequate demonstration of infeasibility to avoid bypassing. If there has not been such a demonstration, then we believe that the language that we provided previously is required.
2. Assuming that there has been an adequate demonstration of no feasible alternative to bypassing WDNR's proposed language could be used provided the following modifications are made.

We provided our comments in the form of edits to your latest text to make it easier to see the specific changes we are requesting. Please note that the attached version highlights the changes that WDNR made to the earlier draft as well as our suggestions. In the first document, our changes appear in blue text when I open the documents and your previous edits are red. In the second document our changes appear to be in red. It may be different when you open them.



Oshkosh & FdL alternative language 2012_09_20 EPA comments 101112.docx



BypasspermitlanguageSept2012 EPA comments 101112.docx

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